

ORIGINAL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

EARL ROBERTS,

Defendant.

Case:2:19-cr-20522  
Judge: Murphy, Stephen J.  
MJ: Grand, David R.  
Filed: 08-15-2019 At 09:17 AM  
INFO USA V ROBERTS (af)

VIOLATION  
Counts One, Two and Three:  
29 U.S.C. § 501(c)  
Embezzlement of Union Assets

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**INFORMATION**

The United States Attorney charges that:

**GENERAL ALLEGATIONS**

At all times relevant to this Information:

1. The United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial Service Workers International Union (USW) was a labor organization based in Pittsburgh, Pennsylvania, that represented workers in every sector of the economy in many states throughout the United States. USW Local 4 (Local 4), located in Yale, Michigan, was established under 29 U.S.C. § 402 by a collective bargaining agreement entered into between Local 4 and Flint Hills Resources. An agreement was in effect between the two entities from August 1,

2009 to July 31, 2016. Local 4 was subordinate to and governed by the USW and did not adopt its own constitution and by-laws.

2. Flint Hills Resources was headquartered in Wichita, Kansas, and Local 4 members worked at the FHR plant in Marysville, Michigan, where they manufactured petrochemicals such as aromatics, olefins and polymers. Once manufactured, these petrochemicals were transferred into interstate commerce to be used in synthetic fibers, agricultural chemicals, packaging, coatings, appliance and automotive parts.

3. Local 4 was a “labor organization” engaged in an industry and activity affecting commerce within the meaning of the Labor Management Reporting and Disclosure Act (“LMRDA”), Title 29, United States Code, Sections 402(i) and (j), and was subject to the provisions of the LMRDA governing “labor organizations.”

4. From 2012 through on or about May 2015, Defendant EARL ROBERTS served as president of Local 4. During that period, EARL ROBERTS was an officer and person employed by Local 4.

**COUNT ONE**  
**29 U.S.C. § 501(c)**  
**Embezzlement of Union Assets**

5. The General Allegations are included in this Count.

6. In or about December of 2012 and continuing through in or about April of 2015, in the Eastern District of Michigan and elsewhere, defendant EARL ROBERTS, while an officer of a labor organization engaged in an industry affecting interstate commerce, that is President of USW Local 4, did unlawfully, willfully and with fraudulent intent embezzle, steal and abstract and convert to his own use and the use of another, money, funds, securities, property and other assets of said labor organization by making and negotiating seventy unauthorized checks from the union's checking account, in the approximate amount of twenty-five thousand four hundred sixty-four dollars (\$25,464), in violation of Title 29, United States Code, Section 501(c).

**COUNT TWO**  
**29 U.S.C. § 501(c)**  
**Embezzlement of Union Assets**

7. The General Allegations and paragraphs 5 and 6 of this Information are included in this Count.

8. From in or about December 2012, to on or about April 17, 2015, in the Eastern District of Michigan, defendant EARL ROBERTS, while an officer of a labor organization engaged in an industry affecting interstate commerce, that is President of Local 4, did unlawfully, willfully, and with fraudulent intent embezzle, steal and abstract and convert to his own use and the use of another, the money, funds, securities, property or other assets of said labor organization by making thirty-six unauthorized cash withdrawals from Local 4's checking and savings accounts, in the approximate amount of twenty-three thousand nine hundred and twenty-two dollars (\$23,922), in violation of Title 29, United States Code, Section 501(c).

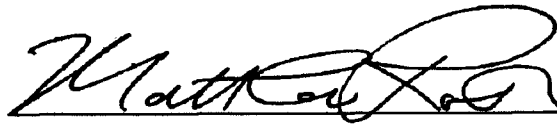
**COUNT THREE**  
**29 U.S.C. § 501(c)**  
**Embezzlement of Union Assets**

9. The General Allegations and paragraphs 5-8 are included in this Count.

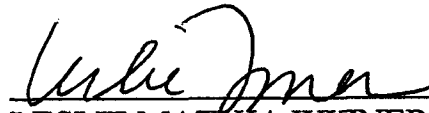
10. From in or about December 2012, to on or about April 17, 2015, in the Eastern District of Michigan, defendant EARL ROBERTS, while an officer, that is President of Local 4, a labor organization engaged in an industry affecting interstate commerce, did unlawfully, willfully, and with fraudulent intent embezzle, steal and

abstract and convert to his own use and the use of another, money, funds, securities, property or other assets of said labor organization by making unauthorized cash withdrawals from Local 4's checking and savings accounts through four unauthorized money orders and cashier's checks, and then negotiating these instruments, in the approximate amount of four thousand three hundred and eleven dollars (\$4,311), in violation of Title 29, United States Code, Section 501(c).

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Date: 8/15/19

**ORIGINAL**United States District Court  
Eastern District of Michigan**Criminal Case Cover**Case: 2:19-cr-20522  
Judge: Murphy, Stephen J.  
MJ: Grand, David R.  
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>LW</u>

Case Title: USA v. Earl RobertsCounty where offense occurred : St. ClairCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☒ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

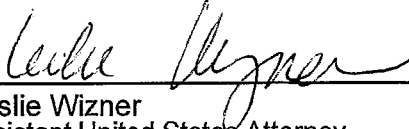
- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 15, 2019

Date

  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.